

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF ILLINOIS

JUAN VARGAS, #M-17897,)	
)	
Plaintiff,)	
)	
-vs-)	No. 15-303-NJR
)	
DEPARTMENT OF CORRECTIONS,)	
et al,)	
)	
Defendants.)	

**MOTION TO EXTEND DISCOVERY SCHEDULE AND DISPOSITIVE MOTION
DEADLINE**

NOW COMES Defendant, CHARLES CONRAD, by and through his attorney, Lisa Madigan, Attorney General of the State of Illinois, and for his Motion to Extend Discovery Schedule and Dispositive Motion Deadline, states as follows:

1. The current discovery deadline in this matter is July 15, 2016. The current dispositive motion deadline in this matter is August 19, 2016.
2. The undersigned has tendered his resignation to the Office of the Attorney General, effective August 12, 2016.
3. The undersigned is scheduled to attend jury trial in *Harris v. Nodine, et al*, 11-1455 (CDIL) in Peoria, Illinois on July 25, 2016, and *Hammond v. James, et al*, 13-418 in East St. Louis, Illinois On August 8, 2016.
4. The Defendant has contemporaneously filed a motion to compel answers to discovery, related to interrogatories and requests for production that Plaintiff has not answered.
5. On July 7, 2016, the undersigned, and co-Defendant's counsel, deposed the Plaintiff. The deposition revealed that Plaintiff possesses sufficient capacity to answer

Defendant's discovery, and that Plaintiff intends to rely on certain information, particularly Plaintiff's medical history, in furtherance of his case. Defendant is entitled to answers to his discovery that would disclose such information.

6. The Defendant respectfully requests that this Court extend the deadline for discovery and dispositive motions by sixty days to allow Defendant to compel answers to discovery from Plaintiff and to allow the Assistant Attorney General reassigned to this matter sufficient time to file a dispositive motion.

7. The Jury Trial in this matter is scheduled for March 7, 2016. Therefore, a sixty-day extension of time will comply with the Court's rule that dispositive motions must be filed outside of 100 days from the presumptive trial date.

WHEREFORE, based on the foregoing, Defendant respectfully requests a sixty-day extension in the current discovery schedule and the deadline to file a dispositive motion.

Respectfully submitted,

CHARLES CONRAD,

Defendant,

LISA MADIGAN, Attorney General,
State of Illinois,

Attorney for Defendant,

By: s/ Bilal A. Aziz

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CERTIFICATE OF SERVICE

I hereby certify that on July 15, 2016, the foregoing document, Motion to Extend Discovery Schedule and Dispositive Motion deadline, on behalf of Defendants, was electronically filed with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Susannah Price sjprice@atg.state.il.us

Charles Pierce cpierce@piercelawpc.com

I hereby certify that on July 18, 2016, I caused a copy of the foregoing described document to be mailed by United States Postal Service, in an envelope properly addressed and fully prepaid, to the following non-registered participant:

Juan Vargas, #M-17897
Lincoln Correctional Center
P.O. Box 549
Lincoln, IL 62656

Respectfully Submitted,

By: s/ Bilal A. Aziz

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